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*HARMAN International Industries, Inc.*

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**WESTERN DIVISION**

ANNETTE CODY, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

HARMAN INTERNATIONAL  
INDUSTRIES, INC.,

Defendant.

Case No. 2:23-cv-10845-PA-RAO

Assigned to Hon. Percy Anderson

**DEFENDANT HARMAN  
INTERNATIONAL INDUSTRIES,  
INC.'S REQUEST FOR JUDICIAL  
NOTICE IN SUPPORT OF MOTION  
TO DISMISS COMPLAINT FOR:  
(1) LACK OF PERSONAL  
JURISDICTION; AND (2) FAILURE  
TO STATE A CLAIM**

*[Filed concurrently with Notice of  
Motion and Motion to Dismiss and  
[Proposed] Order]*

Hearing:

Date: March 25, 2024

Time: 1:30 p.m.

Courtroom: 9A

Complaint served: November 28, 2023

Action removed: December 27, 2023

**REQUEST FOR JUDICIAL NOTICE**

Defendant HARMAN International Industries, Inc. (“Harman”) will, and hereby does, request this Court to take judicial notice pursuant to Federal Rule of Evidence 201 of: (1) the court records attached hereto as Exhibits 1-7; (2) the fact that Plaintiff Annette Cody has filed over 20 cases (listed in Paragraph 8 below) since July 2022 that allege violations of the California Invasion of Privacy Act (“CIPA”); and (3) the fact that counsel for Cody filed over 80 similar actions (listed in Paragraphs 9 below) asserting violations of California Penal Code Section 638.51 for use of a pen register.

Initially, the Court may consider judicially noticed facts submitted in support of a motion to dismiss. *See Byars v. Hot Topic, Inc.*, 656 F. Supp. 3d 1051, 1060 (C.D. Cal. 2023) (taking judicial notice in support of motion to dismiss of “virtually identical lawsuits” filed by Cody’s counsel); *see also Mullis v. U.S. Bankr. Ct. Dist. Nev.*, 828 F.2d 1385, 1388 (9th Cir. 1987) (ruling the Court may consider judicially noticeable facts in support of a motion to dismiss).

Courts may take judicial notice of a fact that “is not subject to reasonable dispute” because the fact “can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned.” Fed. R. Evid. 201(b)(2). Courts, therefore, may take judicial notice of court records and basic facts regarding other cases because these records and facts are not subject to reasonable dispute and can be readily determined from sources whose accuracy cannot reasonably be questioned. *See Reyn’s Pasta Bella, LLC v. Visa USA, Inc.*, 442 F.3d 741, 746 n.6 (9th Cir. 2006) (taking judicial notice of court filings); *Duke v. Gastelo*, 64 F.4th 1088, 1093 n.3 (9th Cir. 2023) (taking judicial notice of facts regarding docket in other case); *Briseno v. Bonta*, 621 F. Supp. 3d 1065, 1070 (C.D. Cal. 2022) (taking judicial notice of facts regarding state court action involving similar claims and similar relief as federal action); *Selane Prods., Inc. v. Cont’l Cas. Co.*, — F. Supp. 3d —, 2020 WL 7253378,

1 at \*3 (C.D. Cal. 2020) (“Under Federal Rule of Evidence 201, a court may take  
2 judicial notice of court filings and other matters of public record.”).

3 Courts must take judicial notice of facts that “can be accurately and readily  
4 determined from sources whose accuracy cannot reasonably be questioned” (such as  
5 court records and facts regarding court dockets) under certain circumstances provided  
6 in Federal Rule of Evidence 201. *See* Fed. R. Evid. 201(b). Specifically, a court must  
7 take judicial notice of these facts when: (1) “a party requests it;” and (2) “the court is  
8 supplied with the necessary information.” Fed. R. Evid. 201(c).

9 The Court must take judicial notice of the documents and facts subject to  
10 Harman’s notice given that Harman supplied the required information.

11 • First, the Court must take judicial notice of the court records attached  
12 hereto as Exhibits 1 through 7 because court records are proper subjects of judicial  
13 notice, Harman requested judicial notice be taken, and Harman furnished the Court  
14 with sufficient information to enable the Court to take judicial notice of the court  
15 records. *See* Fed. R. Evid. 201(c) (requiring judicial notice if party requests it and  
16 provides the necessary information); *Reyn’s Pasta Bella, LLC*, 442 F.3d at 746 n.6  
17 (allowing court to take judicial notice of court filings including pleadings).

18 • Second, the Court must take judicial notice of the fact that Cody has filed  
19 other CIPA actions since July 2022 in California state and federal courts as listed in  
20 Paragraph 8 because that fact can be readily determined and is judicially noticeable,  
21 Harman requested judicial notice, and Harman provided the requisite information for  
22 judicial notice. *See* Fed. R. Evid. 201(c) (requiring judicial notice upon party request  
23 with the necessary information); *Duke*, 64 F.4th at 1093 n.3 (finding facts about court  
24 dockets judicially noticeable).

25 • Third, the Court must take judicial notice of the fact that Cody’s counsel  
26 filed similar pen register claims under California Penal Code Section 638.51 as listed  
27 in Paragraph 9 because that fact can be readily determined and is judicially noticeable,  
28 Harman requested judicial notice, and Harman provided the requisite information for

1 judicial notice. *See* Fed. R. Evid. 201(c); *Duke*, 64 F.4th at 1093 n.3 (taking judicial  
2 notice of facts about court dockets).

3 Accordingly, Harman respectfully requests that the Court take judicial notice of  
4 the following court records and facts regarding court dockets:

### 5 Court Records

6 1. The Complaint filed on November 21, 2022 in United States District  
7 Court for the Southern District of California in the action captioned *Greenley v.*  
8 *Kochava, Inc.*, Case No. 22-cv-01327-BAS-AHG, a true and correct conformed copy  
9 of which is attached to the hereto as **Exhibit 1**.

10 2. The Complaint filed on August 2, 2022 in United States District Court  
11 for the Central District of California in the action captioned *Cody v. Boscovs, Inc.*,  
12 Case No. 22-cv-01434-DOC-ADS a true and correct conformed copy of which is  
13 attached to the hereto as **Exhibit 2**.

14 3. The Complaint filed on February 7, 2023 in United States District Court  
15 for the Central District of California in the action captioned *Cody v. Lacoste USA,*  
16 *Inc.*, Case No. 23-cv-00235-SSS-KK a true and correct conformed copy of which is  
17 attached to the hereto as **Exhibit 3**.

18 4. The Complaint filed on November 17, 2023 in Los Angeles Superior  
19 Court and removed to this Court on December 15, 2023 in the action captioned  
20 *Casillas v. Sleep Number Corporation*, Case No. 2:23-cv-10540-WLH-MAR, a true  
21 and correct conformed copy of which is attached to the hereto as **Exhibit 4**.

22 5. The Complaint filed on November 17, 2023 in Los Angeles Superior  
23 Court and removed to this Court on December 29, 2023 in the action captioned  
24 *Casillas v. ZAPPOS.COM LLC*, Case No. 2:23-cv-10876-WLH-JPR, a true and  
25 correct conformed copy of which is attached to the hereto as **Exhibit 5**.

26 6. The Complaint filed on November 30, 2023 in Los Angeles Superior  
27 Court and removed to this Court on January 16, 2024 in the action captioned *Martin v.*  
28

1 *Char-Broil, LLC*, Case No. 2:24-cv-00395-RGK-JPR, a true and correct conformed  
2 copy of which is attached to the hereto as **Exhibit 6**.

3 7. The Complaint filed on December 4, 2023 in Los Angeles Superior Court  
4 and removed to this Court on January 11, 2024 in the action captioned *Palacios v.*  
5 *Wolverine World Wide, Inc.*, Case No. 2:24-cv-00288-WLH-SSC, a true and correct  
6 conformed copy of which is attached to the hereto as **Exhibit 7**.

7 **Facts Regarding Court Dockets**

8 8. Cody has filed over 20 cases in California state and federal courts that  
9 assert claims under the California Invasion of Privacy Act (“CIPA”) since July 2022.

10 a. Seven of these other cases were filed in or removed to this Court  
11 and include allegations that defendants violated CIPA by purportedly eavesdropping  
12 on chat messages or by purportedly monitoring users’ keystrokes. These cases  
13 include:

- 14 • United States District Court for the Central District of California  
15 case filed on August 16, 2022 with the caption *Cody v. Promises*  
16 *Behavior Health, LLC*, Case No. 22-cv-01529-FWS-JDE.
- 17 • United States District Court for the Central District of California  
18 case filed on September 1, 2022 with the caption *Cody v. Athletic*  
19 *Propulsion Labs LLC*, Case No. 22-cv-01627-JWH-DFM.
- 20 • United States District Court for the Central District of California  
21 case with the caption *Cody v. Tiffany & Co.*, Case No. 22-cv-  
22 01648-DOC-ADS that was removed to this Court on September 6,  
23 2022.
- 24 • The United States District Court for the Central District of  
25 California case with the caption *Cody v. Columbia Sportswear Co.*,  
26 Case No. 22-cv-01654-DOC-JDE that was removed to this Court  
27 on September 7, 2022.

- United States District Court for the Central District of California case with the caption *Cody v. Paula's Choice, LLC*, Case No. 23-cv-00182-JWH-JDE. That was removed to Federal Court on January 30, 2023.
- United States District Court for the Central District of California case with the caption *Cody v. ABT Electronics, Inc.*, Case No. 23-cv-05222-CAS-PVC that was removed to this Court on June 30, 2023.
- United States District Court for the Central District of California case filed on August 19, 2023 with the caption *Cody v. Glasses USA, Inc.*, Case No. 23-cv-01545-JVS-KES.

b. Four of these other cases were filed in or removed to California federal courts outside of this district and allege that defendants violated CIPA by eavesdropping on chat messages. These cases include:

- United States District Court for the Southern District of California case with the caption *Cody v. Movado Group, Inc.*, Case No. 23-cv-00015-H-KSC that was removed to Federal Court on January 4, 2023.
- United States District Court for the Southern District of California case with the caption *Cody v. Ashley Furniture Industries, LLC*, Case No. 23-cv-00065-AJB-WVG that was removed to Federal Court on January 12, 2023.
- United States District Court for the Northern District of California case filed on February 8, 2023 with the caption *Cody v. Ring LLC*, Case No. 23-cv-00562-AMO.
- United States District Court for the Northern District of California case filed on May 10, 2023 with the caption *Cody v. E. Gluck Corporation*, Case No. 23-cv-02286-HSG.



c. Eleven of these other cases were filed in California state court and include allegations that defendants violated CIPA by purportedly eavesdropping on chat messages or by purportedly monitoring visitors' keystrokes. These cases include:

- Orange County Superior Court case filed on July 28, 2022 with the caption *Cody v. Dollar Shave Club Inc.*, Case No. 30-2022-01272183-CU-MT-CXC.
- Orange County Superior Court case filed on August 2, 2022 with the caption *Cody v. Warby Parker Corporation*, Case No. 30-2022-01273354-CU-MT-CXC.
- Los Angeles Superior Court case filed on March 29, 2023 with the caption *Cody v. Skullcandy, Inc.*, Case No. 23STCV06828.
- Los Angeles Superior Court case filed on April 5, 2023 with the caption *Cody v. P.C. Richard and Son Service Company, Inc.*, Case No. 23STCV07578.
- Los Angeles Superior Court case filed on November 8, 2023 with the caption *Cody v. Modani Holdings, LLC*, Case No. 23STCV27495.
- Los Angeles Superior Court case filed on January 2, 2024 with the caption *Cody v. B & H Foto & Electronics Corp.*, Case No. 24STCV00032.
- Los Angeles Superior Court case filed on January 2, 2024 with the caption *Cody v. Backyard Design USA LLC*, Case No. 24STCV00067.
- Los Angeles Superior Court case filed on January 16, 2024 with the caption *Cody v. Sundance Holdings Group, LLC*, Case No. 24STCV01046.
- Los Angeles Superior Court case filed on January 22, 2024 with the caption *Cody v. BH Security, LLC*, Case No. 24STCV01627.

- Los Angeles Superior Court case filed on January 22, 2024 with the caption *Cody v. Bright Market LLC*, Case No. 24STCV01660.
- Los Angeles Superior Court case filed on February 2, 2024 with the caption *Cody v. Industrial Color, Inc.*, Case No. 24STCV02809.

9. Cody's counsel of record (Scott Ferrell at Pacific Trial Attorneys, APC) has filed over 80 other cases containing similar allegations as those made against Harman and involving alleged violations of California Penal Code Section 638.51 for alleged use of a pen register since December 2023. These other cases filed by Cody's counsel include:

- Los Angeles Superior Court case filed on November 13, 2023 with the caption *Diaz v. Meridian Rack & Pinion, Inc.*, Case No. 23STCV27895.
- Los Angeles Superior Court case filed on December 1, 2023 with the caption *Sanchez v. Pets Best Insurance Services, LLC*, Case No. 23STCV29362.
- Los Angeles Superior Court case filed on December 13, 2023 with the caption *Casillas v. The Toro Company*, Case No. 23STCV30451.
- Los Angeles Superior Court case filed on December 13, 2023 with the caption *Levings v. American Express Company*, Case No. 23STCV30449.
- Los Angeles Superior Court case filed on December 14, 2023 with the caption *Casillas v. Turn 5, Inc.*, Case No. 23STCV30454.
- Los Angeles Superior Court case filed on December 15, 2023 with the caption *Casillas v. Transitions Optical, Inc.*, Case No. 23STCV30742.
- Los Angeles Superior Court case filed on December 15, 2023 with the caption *Levings v. Brighton Collectibles, LLC*, Case No. 23STCV30758.
- Los Angeles Superior Court case filed on December 20, 2023 with the caption *Levings v. Viking Electric Supply, Inc.*, Case No. 23STCV31201.



- 1 • Los Angeles Superior Court case filed on December 20, 2023 with the  
 2 caption *Sanchez v. National Instruments Corporation*, Case No.  
 3 23STCV31160.
- 4 • Los Angeles Superior Court case filed on December 21, 2023 with the  
 5 caption *Levings v. Clarins U.S.A. Inc.*, Case No. 23STCV31207.
- 6 • Los Angeles Superior Court case filed on December 21, 2023 with the  
 7 caption *Sanchez v. Find It Parts, Inc.*, Case No. 23STCV31206.
- 8 • Los Angeles Superior Court case filed on December 27, 2023 with the  
 9 caption *Byars v. Divisible Inc.*, Case No. 23STCV31690.
- 10 • Los Angeles Superior Court case filed on December 27, 2023 with the  
 11 caption *Byars v. Everstage Inc.*, Case No. 23STCV31685.
- 12 • Los Angeles Superior Court case filed on December 27, 2023 with the  
 13 caption *Sanchez v. BLST Draper's & Damon's LLC*, Case No.  
 14 23STCV31538.
- 15 • Los Angeles Superior Court case filed on January 2, 2024 with the  
 16 caption *Byars v. Almabase, Inc.*, Case No. 24STCV00010.
- 17 • Los Angeles Superior Court case filed on January 2, 2024 with the  
 18 caption *Byars v. K & B Surgical Center, LLC*, Case No. 24STCV00014.
- 19 • Los Angeles Superior Court case filed on January 2, 2024 with the  
 20 caption *Byars v. Primer Labs Inc.*, Case No. 24STCV00013.
- 21 • Los Angeles Superior Court case filed on January 2, 2024 with the  
 22 caption *Byars v. Testsigma Technologies, Inc.*, Case No. 24STCV00008.
- 23 • Los Angeles Superior Court case filed on January 4, 2024 with the  
 24 caption *Casillas v. Steel Technology, LLC*, Case No. 24STCV00201.
- 25 • Los Angeles Superior Court case filed on January 4, 2024 with the  
 26 caption *Sanchez v. Weber-Stephen Products LLC*, Case No.  
 27 24STCV00217.
- 28

- 1 • Los Angeles Superior Court case filed on January 5, 2024 with the
- 2 caption *Casillas v. Simon Pearce (U.S.), Inc.*, Case No. 24STCV00401.
- 3 • Los Angeles Superior Court case filed on January 5, 2024 with the
- 4 caption *Levings v. 360Sweater Company, LLC*, Case No. 24STCV00403.
- 5 • Los Angeles Superior Court case filed on January 8, 2024 with the
- 6 caption *Casillas v. Auctane, Inc.*, Case No. 24STCV00411.
- 7 • Los Angeles Superior Court case filed on January 8, 2024 with the
- 8 caption *Levings v. Evolutions Brands, Inc.*, Case No. 24STCV00416.
- 9 • Los Angeles Superior Court case filed on January 8, 2024 with the
- 10 caption *Sanchez v. Delta Galil USA, Inc.*, Case No. 24STCV00395.
- 11 • Los Angeles Superior Court case filed on January 12, 2024 with the
- 12 caption *Byars v. Codebaby, Inc.*, Case No. 24STCV00982.
- 13 • Los Angeles Superior Court case filed on January 12, 2024 with the
- 14 caption *Byars v. Localize Corporation*, Case No. 24STCV01110.
- 15 • Los Angeles Superior Court case filed on January 12, 2024 with the
- 16 caption *Casillas v. Roku, Inc.*, Case No. 24STCV00983.
- 17 • Los Angeles Superior Court case filed on January 16, 2024 with the
- 18 caption *Casillas v. Daniel Wellington Inc.*, Case No. 24STCV01071.
- 19 • Los Angeles Superior Court case filed on January 16, 2024 with the
- 20 caption *Levings v. Stokke LLC*, Case No. 24STCV01129.
- 21 • Los Angeles Superior Court case filed on January 16, 2024 with the
- 22 caption *Levings v. Violet Grey, Inc.*, Case No. 24STCV01125.
- 23 • Los Angeles Superior Court case filed on January 17, 2024 with the
- 24 caption *Valenzuela v. Hooters of America, LLC*, Case No.
- 25 24STCV01382.
- 26 • Los Angeles Superior Court case filed on January 18, 2024 with the
- 27 caption *Cantu v. Chargebee Inc.*, Case No. 24STCV01308.
- 28

- 1 • Los Angeles Superior Court case filed on January 18, 2024 with the
- 2 caption *Casillas v. Hanesbrands Inc.*, Case No. 24STCV01291.
- 3 • Los Angeles Superior Court case filed on January 18, 2024 with the
- 4 caption *Casillas v. Iherb Inc.*, Case No. 24STCV01277.
- 5 • Los Angeles Superior Court case filed on January 18, 2024 with the
- 6 caption *Casillas v. Minerva Beauty, Inc.*, Case No. 24STCV01281.
- 7 • Los Angeles Superior Court case filed on January 18, 2024 with the
- 8 caption *Casillas v. RW USA Corp.*, Case No. 24STCV01354.
- 9 • Los Angeles Superior Court case filed on January 18, 2024 with the
- 10 caption *Casillas v. Traveler's Choice Travelware*, Case No.
- 11 24STCV01337.
- 12 • Los Angeles Superior Court case filed on January 18, 2024 with the
- 13 caption *Garcia v. Bio-Techne Corporation*, Case No. 24STCV01286.
- 14 • Los Angeles Superior Court case filed on January 18, 2024 with the
- 15 caption *Levings v. Cartera Commerce, Inc.*, Case No. 24STCV01290.
- 16 • Los Angeles Superior Court case filed on January 18, 2024 with the
- 17 caption *Levings v. Conversica Inc.*, Case No. 24STCV01285.
- 18 • Los Angeles Superior Court case filed on January 22, 2024 with the
- 19 caption *Levings v. Tempur Sealy International, Inc.*, Case No.
- 20 24STCV01612.
- 21 • Los Angeles Superior Court case filed on January 22, 2024 with the
- 22 caption *Palacios v. Wrestlingmart.Com, LLC*, Case No. 24STCV01607.
- 23 • Los Angeles Superior Court case filed on January 23, 2024 with the
- 24 caption *Casillas v. Thermos LLC*, Case No. 24STCV01821.
- 25 • Los Angeles Superior Court case filed on January 23, 2024 with the
- 26 caption *Palacios v. Terlato Wine Group, Ltd.*, Case No. 24STCV01814.
- 27
- 28

- 1 • Los Angeles Superior Court case filed on January 24, 2024 with the  
 2 caption *Palacios v. Justice Brand Holdings LLC*, Case No.  
 3 24STCV01857.
- 4 • Los Angeles Superior Court case filed on January 25, 2024 with the  
 5 caption *Palacios v. Gaffos Inc.*, Case No. 24STCV02034.
- 6 • Los Angeles Superior Court case filed on January 25, 2024 with the  
 7 caption *Palacios v. Merle Norman Cosmetics, Inc.*, Case No.  
 8 24STCV02036.
- 9 • Los Angeles Superior Court case filed on January 26, 2024 with the  
 10 caption *Palacios v. August Home, Inc.*, Case No. 24STCV02068.
- 11 • Los Angeles Superior Court case filed on January 30, 2024 with the  
 12 caption *Casillas v. Docusign, Inc.*, Case No. 24STCV02336.
- 13 • Los Angeles Superior Court case filed on January 30, 2024 with the  
 14 caption *Casillas v. Instapage, Inc.*, Case No. 24STCV02315.
- 15 • Los Angeles Superior Court case filed on January 30, 2024 with the  
 16 caption *Casillas v. Vitality Holdings, LLC*, Case No. 24STCV02329.
- 17 • Los Angeles Superior Court case filed on January 30, 2024 with the  
 18 caption *Levings v. Barracuda Networks, Inc.*, Case No. 24STCV02299.
- 19 • Los Angeles Superior Court case filed on January 30, 2024 with the  
 20 caption *Levings v. Manscaped, Inc.*, Case No. 24STCV02289.
- 21 • Los Angeles Superior Court case filed on January 30, 2024 with the  
 22 caption *Palacios v. C & J Clark America, Inc.*, Case No. 24STCV02312.
- 23 • Los Angeles Superior Court case filed on January 30, 2024 with the  
 24 caption *Sanchez v. Unite Eurotherapy, Inc.*, Case No. 24STCV02282.
- 25 • Los Angeles Superior Court case filed on February 1, 2024 with the  
 26 caption *Levings v. Medallia, Inc.*, Case No. 24STCV02780.
- 27 • Los Angeles Superior Court case filed on February 1, 2024 with the  
 28 caption *Levings v. Netapp, Inc.*, Case No. 24STCV02772.

- 1 • Los Angeles Superior Court case filed on February 1, 2024 with the
- 2 caption *Palacio v. Curio Brands, LLC*, Case No. 24STCV02760.
- 3 • Los Angeles Superior Court case filed on February 1, 2024 with the
- 4 caption *Palacios v. CBD.co*, Case No. 24STCV02662.
- 5 • Los Angeles Superior Court case filed on February 1, 2024 with the
- 6 caption *Palacios v. Stack's-Bowers Numismatics, LLC*, Case No.
- 7 24STCV02701.
- 8 • Los Angeles Superior Court case filed on February 1, 2024 with the
- 9 caption *Palacios v. The Chicago Wine Company, LLC*, Case No.
- 10 24STCV02717.
- 11 • Los Angeles Superior Court case filed on February 2, 2024 with the
- 12 caption *Palacios v. Decibullz LLC*, Case No. 24STCV02827.
- 13 • Los Angeles Superior Court case filed on February 2, 2024 with the
- 14 caption *Palacios v. Ebates Performance Marketing, Inc.*, Case No.
- 15 24STCV02824.
- 16 • Los Angeles Superior Court case filed on February 2, 2024 with the
- 17 caption *Palacios v. Mulberry Company USA*, Case No. 24STCV02769.
- 18 • Los Angeles Superior Court case filed on February 5, 2024 with the
- 19 caption *Palacios v. Great Wolf Resorts, Inc.*, Case No. 24STCV02863.
- 20 • Los Angeles Superior Court case filed on February 6, 2024 with the
- 21 caption *Casillas v. Iterable, Inc.*, Case No. 24STCV03152.
- 22 • Los Angeles Superior Court case filed on February 7, 2024 with the
- 23 caption *Casillas v. Pella Corporation*, Case No. 24STCV03158.
- 24 • Los Angeles Superior Court case filed on February 7, 2024 with the
- 25 caption *Levings v. Gong.io Inc.*, Case No. 24STCV03183.
- 26 • Los Angeles Superior Court case filed on February 7, 2024 with the
- 27 caption *Palacios v. Medlock Ames Vintners, LLC*, Case No.
- 28 24STCV03155.

- Los Angeles Superior Court case filed on February 8, 2024 with the caption *Palacios v. Wilson Sporting Goods Co.*, Case No. 24STCV03300.
- Los Angeles Superior Court case filed on February 7, 2024 with the caption *Palacios v. SurveyMonkey Inc.*, Case No. 24STCV03160.
- Los Angeles Superior Court case filed on February 14, 2024 with the caption *Levings v. The Danville Group*, Case No. 24STCV03745.
- Los Angeles Superior Court case filed on February 14, 2024 with the caption *Levings v. Illumina, Inc.*, Case No. 24STCV03760.
- Los Angeles Superior Court case filed on February 14, 2024 with the caption *Levings v. Boll & Branch LLC*, Case No. 24STCV03772.
- Los Angeles Superior Court case filed on February 20, 2024 with the caption *Casillas v. Direct Financial Solutions, LLC*, Case No. 24STCV04131.
- Los Angeles Superior Court case filed on February 20, 2024 with the caption *Casillas v. Resident Home LLC*, Case No. 24STCV04137.
- Los Angeles Superior Court case filed on February 20, 2024 with the caption *Casillas v. Sage Software, Inc.*, Case No. 24STCV04145.
- Los Angeles Superior Court case filed on February 20, 2024 with the caption *Sanchez v. Avon Co.*, Case No. 24STCV04147.
- Los Angeles Superior Court case filed on February 20, 2024 with the caption *Sanchez v. Wellness.com Inc.*, Case No. 24STCV04150.

### **CONCLUSION**

For the foregoing reasons, Harman respectfully requests that the Court take judicial notice of the documents attached hereto as Exhibits 1-7 and the facts identified in Paragraphs 8-9.



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1 Dated: February 23, 2024

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